ERO number 026-0414 Streamlining requirements for waste disposal site service area and fill rate changes

Ontario's proposal to remove the Environmental Screening Process for landfill service area and fill rate changes, and to exempt related approvals from Environmental Registry posting and appeal rights, is framed as an efficiency measure. In practice, it reduces transparency, weakens oversight, and shifts decision making away from a framework that considers environmental impacts and alternatives.

Without a formal screening process, there is less requirement to assess options such as waste reduction and diversion. Removing public posting and appeal rights further limits visibility and accountability. Together, these changes risk making landfill expansion the default outcome rather than a last resort, while also reducing meaningful participation by municipalities, Indigenous communities, and the public.

The emissions implications are significant. Landfills are a major source of methane in Canada, accounting for roughly one fifth of national emissions. Methane has more than eighty times the warming impact of carbon dioxide over twenty years, making near term increases especially harmful. Organic waste is the primary driver, and when diverted through composting or anaerobic digestion, these emissions are largely avoided.

Expanding landfill service areas and fill rates without strengthening diversion requirements increases the amount of organic waste sent to landfill and extends methane emissions over decades. While gas capture systems are required at many sites, they are not fully effective, typically capturing only a portion of total emissions. The remainder escapes into the atmosphere.

By removing requirements to assess alternatives and consider cumulative impacts, the proposal risks enabling incremental decisions that collectively increase emissions. Jurisdictions that prioritize organics diversion achieve substantial methane reductions, while those that expand landfill capacity without enforceable diversion move in the opposite direction.

The issue is not operational flexibility, but whether it is paired with clear safeguards. Without transparency, public participation, and enforceable diversion requirements, Ontario cannot demonstrate that waste policy is aligned with emissions reduction or a transition to a circular economy.

Recommendations

- Maintain Environmental Registry posting for all landfill approval changes to ensure transparency
- Retain third party appeal rights to allow independent review of decisions
- Require a streamlined alternatives assessment for any increase in service area or fill rate, including diversion options
- Establish enforceable organics diversion requirements tied to landfill approvals
- Limit landfill expansion unless diversion targets are being met
- Require cumulative impact assessment for incremental capacity increases

- Strengthen Indigenous and community engagement through meaningful consultation
- Require best available methane capture, monitoring, and public reporting
- Set provincial methane reduction targets for the waste sector with accountability
- Report annually on landfill capacity, diversion rates, and methane emissions

Sources

1. **Waste and greenhouse gases: Canada's actions – Government of Canada**
   https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/waste-greenhouse-gases-canada-actions.html
   Confirms that landfills are a major source of methane in Canada (about 17% of national methane emissions) and that diverting organic waste significantly reduces these emissions.
2. **Landfill Methane Regulations – Government of Canada**
   https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/waste-greenhouse-gases-canada-actions/landfill-methane-regulations.html
   Explains that landfill methane is generated from organic waste over decades and requires ongoing monitoring and control, underscoring the need for strong oversight and accountability.
3. **Reducing methane emissions from Canada's municipal solid waste landfills – Discussion Paper**
   https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/reducing-methane-emissions-canada-municipal-solid-waste-landfills-discussion.html
   Shows that most landfill methane comes from biodegradable waste and that even with capture systems, a significant portion of emissions is not recovered, highlighting limits of relying on landfill management alone.